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*Attorneys for Defendants Joe and Barbara Campbell*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

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TRI COUNTY TELEPHONE  
ASSOCIATION, a Wyoming corporation,

Plaintiff,

vs.

JOE CAMPBELL and BARBARA  
CAMPBELL, individuals, and JOHN  
AND JANE DOES 1-10,

Defendants.

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Case No. 2:17-cv-00089-NDF

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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT OR, IN THE  
ALTERNATIVE, TO STAY**

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Pursuant to Rule 56, *Fed. R. Civ. P.*, Defendants Joe and Barbara Campbell (the “Campbells”), hereby move for summary judgment on all claims in the Complaint. For the reasons set forth in the accompanying Statement of Facts and Memorandum of Points and Authorities in Support of Motion For Summary Judgment or, in the Alternative, to Stay, and based upon the record herein, there is no material issue of disputed fact and the

Campbells are entitled to judgment as a matter of law. In the alternative, for the reasons the Campbells set forth in the accompanying Statement of Facts and Memorandum of Points and Authorities in Support of Motion For Summary Judgment or, in the Alternative, to Stay, this Court should stay this action pending the outcome of the class action litigation pending in the Park County, Wyoming, District Court.

DATED this 1<sup>st</sup> day of March, 2019.

/s/ Richard R. Thomas

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT OR, IN THE ALTERNATIVE, TO STAY** was electronically filed via CM/ECF this 1st day of March, 2019 and served via ECF on all parties who have requested notice:

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/s/ Kristin E. Davenport